

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

WATERKEEPER ALLIANCE, INC.,

Plaintiff,

v.

SPIRIT OF UTAH WILDERNESS, INC.,  
d/b/a GREAT SALT LAKEKEEPER, or  
GREAT SALT LAKE WATER KEEPERS,

Defendant.

Civil Action No. 10-CV-1136 (NSR)

**PLAINTIFF'S NOTICE OF MOTION  
FOR CONTEMPT AND IMPRISONMENT**

PLEASE TAKE NOTICE that upon the attached declaration of John H. Reichman, dated December 5, 2019, and the declaration of Daniel Estrin, dated December 5, 2019, and the exhibits annexed thereto, and upon all prior papers and pleadings herein, Plaintiff Waterkeeper Alliance, Inc., will move this Court, before the Honorable Nelson S. Román, U.S.D.J., at the United States District Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York, 10601, with oral argument on a date and time designated by the Court in its discretion, for an Order imprisoning Jeffrey Salt for his continuous contempt of this Court's Orders dated May 8, 2015, October 2, 2017, and April 5, 2019 and granting such other and further relief as may be just and proper.

Dated: New York, New York  
December 5, 2019

**WACHTEL MISSRY LLP**

By: /S/ Jason L. Libou  
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*Attorneys for Plaintiff Waterkeeper  
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TO: Jeff Salt  
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723 E. Lisonbee Avenue  
Salt Lake City, Utah 84106

Spirit of Utah Wilderness, Inc.  
c/o Jeff Salt  
723 E. Lisonbee Avenue  
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